

Trey A. Monsour
State Bar No. 14277200
Polsinelli PC
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
Polsinelli PC
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com

COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

SENIOR CARE CENTERS, LLC, *et al.*,¹

Debtors.

Chapter 11
Case No. 18-33967 (BJH)

(Jointly Administered)

**NOTICE OF AMENDED AGENDA OF
MATTERS SCHEDULED FOR
HEARING ON JUNE 11, 2019 AT 1:30 P.M. AND 2:00 P.M. (CT)**

MATTERS GOING FORWARD

1. Status Conference [Docket No. 1229].

Objection Deadline: June 4, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1230; Filed: 6/03/2019]
- b) Debtors Emergency Motion for an Order to Show Cause [Docket No. 1213; Filed May 30, 2019]

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

- c) Notice of Debtors Status Report Regarding Vendor Hold for May 31, 2019 [Docket No. 1223; Filed 5/31/2019]
- d) Notice of Debtors Status Report Regarding Vendor Hold for June 1, 2019 [Docket No. 1225; Filed 6/01/2019]
- e) Notice of Debtors Status Report Regarding Vendor Hold for June 2, 2019 [Docket No. 1226; Filed 6/02/2019]
- f) Motion of Debtors to Convert Show Cause Hearing On June 3, 2019 to a Status Conference and Reschedule Show Cause Hearing to June 11, 2019 [Docket No. 1248; Filed 6/03/2019]
- g) Order Granting Motion to Change the Show Cause Hearing Set 6/5/2019 to a Status Conference [Docket No. 1264; Filed 6/05/2019]
- h) Notice of Debtors Status Report Regarding Vendor Hold for June 6, 2019 [Docket No. 1286; Filed 6/06/2019]

Response(s) Received:

- a) Status Report Regarding Prospective Payments From Managed Care Organizations [Docket No. 1245; Filed 6/03/2019]
- b) Texas Health and Human Services Commission's Motion to Continue Show Cause Hearing [Currently Set for June 11, 2019] and to Convert Evidentiary Hearing to Nonevidentiary Status Conference [Docket No. 1289; Filed 6/07/2019]
- c) Texas Health and Human Services Commission's Response to Order to Show Cause Entered Upon Debtor's Emergency Motion For an Order to Show Cause and Motion to Make More Definite and Certain (Relates to Dkts. 1213 and 1229) [Docket No. 1298; Filed 6/10/2019]

Status: This matter will go forward.

- 2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 24; Filed: 12/5/2018].

Objection Deadline: March 18, 2019

Related Document(s):

- a) Findings of Fact and Conclusions of Law Regarding the Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 74; Entered: 12/7/2018]
- b) Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 75; Entered: 12/7/2018]
- c) Preliminary Omnibus Reply in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 199; Filed: 12/26/2018]
- d) Debtors' Memorandum of Law Regarding the Debtors' Obligation to Pay Rent for Nursing Home Leases Subject to a Pending Rejection Motion [Docket No. 321; Filed: 1/10/2019]
- e) G Debtors' Brief in Opposition Regarding the Debtors' Obligation to Pay Rent for Nursing Home Leases Subject to a Pending Rejection Motion [Docket No. 324; Filed: 1/10/2019]
- f) Revised Budget [Docket No. 351; Filed: 1/14/2019]
- g) Second Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 431; Entered: 1/24/2019]
- h) Notice of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et. al., of an Agreed Extension of the Challenge Deadline [Docket No. 590; Filed 2/28/2019]
- i) Notice of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et. al., of a Second Agreed Extension of the Challenge Deadline [Docket No. 486; Filed 2/11/2019]
- j) Third Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 673; Entered 3/14/2019]
- k) Fourth Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 962; Entered 4/17/2019]

- l) Fifth Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 1228; Entered 6/03/2019]
- m) Sixth Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 1278; Entered 6/06/2019]

Response(s) Received:

- a) Objection of Texas Ad Valorem Taxing Jurisdictions to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 117; Filed: 12/12/2018]
- b) Texas Health and Human Services Commission's Limited Objection to motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 142; Filed: 12/17/2018]
- c) Limited Objection of San Antonio North Knoll, LLC to the Use of Cash Collateral [Docket No. 146; Filed: 12/19/2018]
- d) Response of HC Hill Country Associates, Ltd., H-C Associates, Ltd., HC-RW Associates Ltd., Hidalgo Healthcare Realty, LLC, and Socorro Health Realty, LLC to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 148; Filed: 12/19/2018]
- e) CCP Landlords' Reservation of Rights and Limited Objection to Debtors' Motion to Use Cash Collateral [Docket No. 149; Filed: 12/19/2018]
- f) Objection of OLP Wyoming Springs, LLC to (I) Motion for Entry of Order Authorizing Payment of Prepetition Taxes and Fees; and (II) Motion for Entry of Interim and Final Orders Authorizing the Use of Cash Collateral [Docket No. 151; Filed: 12/19/2018]
- g) Limited Objection of Atlas Dental Management, LLC to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 152; Filed: 12/19/2018]

- h) TXMS Real Estate Investments, Inc.'s Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 153; Filed: 12/19/2018]
- i) Objection of PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 154; Filed: 12/19/2018]
- j) Limited Objection of KeyBank National Association to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 155; Filed: 12/19/2018]
- k) The United States of America's Limited Objection to Debtors' Motion for Entry of Interim and Final Order Authorizing Use of Cash Collateral [Docket No. 157; Filed: 12/19/2018]
- l) Tax Authorities' Objection to Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 158; Filed: 12/19/2018]
- m) Granite Landlords' Limited Objection and Limited Joinder in KeyBank National Association's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 174; Filed: 12/21/2018]
- n) Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 187; Filed: 12/21/2018]
- o) CCP Landlords' First Amended Objection to Debtors' Motion to Use Cash Collateral [Docket No. 189; Filed: 12/21/2018]
- p) Brief in Support of Objection of PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final

Hearing, and (V) Granting Related Relief [Docket No. 205; Filed: 12/26/2018]

- q) Limited Objection of Love Funding Corporation to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 270; Filed: 1/7/2019]
- r) Limited Objection of Onsite Dentists of Texas to Debtors' Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 293; Filed: 1/9/2019]
- s) CCP Landlords' Memorandum of Law in Support of Debtors' Obligations to Timely Pay Post-Petition Rental Obligations [Docket No. 302; Filed: 1/10/2019]
- t) HC Hill Country Associates, Ltd., H-C Associates, Ltd., HC-RW Associates Ltd., Hidalgo Healthcare Realty, LLC, and Socorro Health Realty, LLC's Memorandum of Law in Support of Response to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 307; Filed: 1/10/2019]
- u) OLP Wyoming Springs, LLC's Supplemental Brief in Support of Objection to (I) Taxes Motion and (II) Cash Collateral Motion [Docket No. 312; Filed: 1/10/2019]
- v) Cedar Park Healthcare, LLC's Hearing Brief Regarding Debtors' Post-Petition Lease Obligations Pending Rejection and Transition of Operations [Docket No. 313; Filed: 1/10/2019]
- w) TXMS Real Estate Investments, Inc.'s Surreply Brief in Support of Its Objection to Debtors Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 314; Filed: 1/10/2019]
- x) Brief in Support of Granite Landlords' Limited Objection and Limited Joinder in KeyBank National Association's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 315; Filed: 1/10/2019]

- y) Limited Objection of Berkadia Commercial Mortgage LLC to Motion of Debtors for Entry of Interim and Final Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 320; Filed: 1/10/2019]
- z) Limited Objection of Texas Nursing Home Management Solutions, LLC to Debtors' Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 344; Filed: 1/12/2019]
- aa) Texas Health and Human Services Commission's Supplemental Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 370; Filed: 1/16/2019]
- bb) Cedar Park Healthcare, LLC's Response to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 499; Filed: 2/13/2019]
- cc) POTA JV, LLC's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 531; Filed: 2/19/2019]
- dd) Brief In Opposition filed by Creditor PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion to Use Cash Collateral [Docket No. 712; Filed 03/18/2019]
- ee) Patient Care Ombudsman Request for Payment of Fees and Costs and Objection to the Use of Cash Collateral to Pay Professionals Significantly More Than Which Was Budget for the PCO and His Counsel [Docket No. 720; Filed 3/19/2019]
- ff) Restated & Amended Objection of Berkadia Commercial Mortgage LLC to Motion of Debtors for Entry of Interim Order and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 1099; Filed 5/16/2019]
- gg) ORIX Real Estate Capital, LLC's Limited Objection to Entry of Final Cash Collateral Order [Docket No. 1160; Filed 5/21/2019]

- hh) Granite Landlords' Supplemental Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief (Docket No. 1172; Filed 5/22/2019]
- ii) Patient Care Ombudsman's Limited Objection to the Debtors Use of Cash Collateral and Entry of a Final Order on Cash Collateral [Docket No. 1208; Filed 5/29/2019]
- jj) Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1212; Filed 5/30/2019]

Status: This matter will go forward on an interim basis.

3. Motion of Debtors for Order Authorizing and Approving Procedures for Sale or Abandonment of De Minimis Assets [Docket No. 1024; Filed: 4/30/2019]

Objection Deadline: May 21, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1025; Filed: 4/30/2019]

Response(s) Received:

- a) Informal Response received from Wells Fargo Bank, NA.
- b) Informal Response received from CIBC, Bank USA.
- c) Informal Response received from the Official Committee of Unsecured Creditors.
- d) Informal Response received from the Office of the United States Trustee, U.S. Department of Justice.

Status: This matter will go forward.

4. Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor Thelma Wylie as Next Friend of Thelma Fontenot [Docket No. 1061; Filed: 5/10/2019]

Objection Deadline: May 24, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1063; Filed: 5/10/2019]

- b) Declaration of Andrew Skemp in Support Thereof [Docket No. 1062; Filed 5/10/2019]

Response(s) Received:

- a) None

Status: This matter will go forward.

- 5. Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor Mae Milligan [Docket No. 1094; Filed: 5/16/2019]

Objection Deadline: May 30, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1169; Filed: 5/21/2019]

Response(s) Received:

- a) Debtors' Omnibus Objection to Various Motions for Relief from Stay to Continue Litigation [Docket No. 1211; Filed 5/30/2019]

Status: This matter will go forward.

- 6. Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor Inez Cardenas Garza [Docket No. 1102; Filed: 5/17/2019]

Objection Deadline: May 31, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1104; Filed: 5/17/2019]
- b) Declaration in Support Thereof [Docket No. 1103; Filed 5/17/2019]
- c) Supplement In Support of Motion for Relief from Stay [Docket No. 1148; Filed 5/20/2019]

Response(s) Received:

- a) Debtors' Omnibus Objection to Various Motions for Relief from Stay to Continue Litigation [Docket No. 1211; Filed 5/30/2019]

Status: This matter will go forward.

7. Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor Marynell Maloney Law Firm on behalf of Janet Baxter, Ind. And on Behalf of the Estate of Ella Baxter [Docket No. 1111; Filed: 5/17/2019]

Objection Deadline: May 31, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1113; Filed: 5/17/2019]
- b) Declaration of Michele Maloney In Support Thereof [Docket No. 1112; Filed 5/17/2019]

Response(s) Received:

- a) Debtors' Omnibus Objection to Various Motions for Relief from Stay to Continue Litigation [Docket No. 1211; Filed 5/30/2019]

Status: This matter will go forward.

8. Amended Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor Maloney Law Group, P.L.L.C. [Docket No. 1114; Filed: 5/17/2019]

Objection Deadline: May 30, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1115; Filed: 5/17/2019]
- b) Declaration of Byron Miller In Support Thereof [Docket No. 1114; Filed 5/17/2019]

Response(s) Received:

- a) Debtors' Omnibus Objection to Various Motions for Relief from Stay to Continue Litigation [Docket No. 1211; Filed 5/30/2019]

Status: This matter will go forward.

9. Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor H. Ray Sharp, As Personal Representative of the Estate of Betty Sharp [Docket No. 1144; Filed: 5/17/2019]

Objection Deadline: May 31, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1145; Filed: 5/17/2019]

Response(s) Received:

- a) Debtors' Omnibus Objection to Various Motions for Relief from Stay to Continue Litigation [Docket No. 1211; Filed 5/30/2019]

Status: This matter will go forward.

- 10. Motion for Relief from the Automatic Stay to Continue Litigation filed by Creditor Travis Coles, as Next of Friend of Jonathan Coles, a Minor [Docket No. 1149; Filed: 5/20/2019]

Objection Deadline: May 31, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1150; Filed: 5/20/2019]
- b) Declaration in Support Thereof [Docket No. 1153; Filed 5/20/2019]

Response(s) Received:

- a) Debtors' Omnibus Objection to Various Motions for Relief from Stay to Continue Litigation [Docket No. 1211; Filed 5/30/2019]

Status: This matter will go forward.

- 11. Application for Administrative Expense Claim filed by Granite Landlords [Docket No. 640; Filed: 3/06/2019]

Objection Deadline: April 3, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 753; Filed: 3/25/2019]
- b) Granite Landlord's Motion for Expedited Consideration (Regarding Dkt Nos. 640 and 641) [Docket No. 642; Filed: 03/06/2019]
- c) Objection of Granite Landlords to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed By the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1287; Filed 6/07/2019]

Response(s) Received:

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et al. to the Granite Landlords' Motion for Expedited Consideration [Docket No. 653; Filed 3/11/2019]
- b) Lancaster Pollard Mortgage Company LLC's Response In Support of the Granite Landlord's Application for Administrative Expense Claim and Motion for Adequate Protection [Docket No. 923; Filed 4/11/2019]
- c) G-Debtors' Objection to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of An Order Granting Adequate Protection Pursuant to 11 U.S.C. Sections 361 and 363 [Docket No. 916; Filed 4/10/2019]
- d) Emergency Motion of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al. to (I) Continue Hearing on Various Pleadings Filed By the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1281; Filed 6/06/2019]
- e) Orix Real Estate Capital, LLC's Objection to the Official Committee of Unsecured Creditors to (I) Continue Hearing On Various Pleadings Filed By the Granite Landlords Schedules for June 11, 2019 and (II) Compel Mediation [Docket No. 1295; Filed 6/09/2019]

Status: This matter will go forward.

12. Motion for Entry of Order Granting Adequate Protection Pursuant to 11 U.S.C. Sections 361 and 363 [Docket No. 641; Filed: 3/06/2019]

Objection Deadline: April 3, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 753; Filed: 3/25/2019]
- b) Granite Landlord's Motion for Expedited Consideration (Regarding Dkt Nos. 640 and 641) [Docket No. 642; Filed: 03/06/2019]
- c) Objection of Granite Landlords to Emergency Motion of the Official Committee of Unsecured Creditors to (I) Continue Hearing on Various Pleadings Filed By the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1287; Filed 6/07/2019]

Response(s) Received:

- a) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et al. to the Granite Landlords' Motion for Expedited Consideration [Docket No. 653; Filed 3/11/2019]
- b) Lancaster Pollard Mortgage Company LLC's Response In Support of the Granite Landlord's Application for Administrative Expense Claim and Motion for Adequate Protection [Docket No. 923; Filed 4/11/2019]
- c) G-Debtors' Objection to the Granite Landlords' Application for Administrative Expense Claim and Motion for the Entry of An Order Granting Adequate Protection Pursuant to 11 U.S.C. Sections 361 and 363 [Docket No. 916; Filed 4/10/2019]
- d) Emergency Motion of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, Et Al. to (I) Continue Hearing on Various Pleadings Filed By the Granite Landlords Scheduled for June 11, 2019 and (II) Compel Mediation [Docket No. 1281; Filed 6/06/2019]
- e) Orix Real Estate Capital, LLC's Objection to the Official Committee of Unsecured Creditors to (I) Continue Hearing On Various Pleadings Filed By the Granite Landlords Schedules for June 11, 2019 and (II) Compel Mediation [Docket No. 1295; Filed 6/09/2019]

Status: This matter will go forward.

Dated: June 10, 2019
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ Trey A. Monsour

Trey A. Monsour (State Bar No. 14277200)
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tmonsour@polsinelli.com

-and-

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com

*Counsel to the Debtors and
Debtors in Possession*